

YI-CHIN HO (CA SBN 204834)
yi-chin.ho@hugheshubbard.com
HUGHES HUBBARD & REED LLP
1999 Avenue of the Stars, 9th Floor
Los Angeles, CA 90071
Telephone: (213) 613-2800
Fax: (213) 613-2950

Attorneys for Defendants
MAXEON SOLAR TECHNOLOGIES, LTD.,
WILLIAM MULLIGAN, and KAI
STROHBECKE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JEYAKUMAR VS MENON, Individually
and on Behalf of All Others Similarly
Situating,

Plaintiff,

vs.

MAXEON SOLAR TECHNOLOGIES,
LTD., WILLIAM MULLIGAN, and KAI
STROHBECKE,

Defendants.

CASE NO. 3:24-CV-03869-EMC

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEFENDANTS'
TIME TO RESPOND TO THE SECOND
AMENDED COMPLAINT**

1 WHEREAS, on November 8, 2024, Plaintiff Jeyakumar VS Menon (“Plaintiff”) filed an
2 amended class action complaint (ECF No. 66);

3 WHEREAS, on December 20, 2024, Defendants Maxeon Solar Technologies, Ltd.
4 (“Maxeon”), William Mulligan, and Kai Strohbecke (collectively “Defendants”, and together with
5 Plaintiff, the “Parties”) filed a motion to dismiss the amended class action complaint (*See* ECF Nos.
6 70-72);

7
8 WHEREAS, on April 28, 2025, the Court entered an Order Granting Defendants’ Motion to
9 Dismiss Plaintiff’s Amended Class Action Complaint with leave for Plaintiff to file a second amended
10 complaint within four weeks of the order and, if a second amended complaint was filed, permitting
11 Defendants to have four weeks thereafter to file a response (ECF No. 90);

12 WHEREAS, on May 27, 2025, Plaintiff filed the Second Amended Class Action Complaint
13 against Defendants (ECF No. 91, “the Second Amended Complaint”);

14 WHEREAS, Defendants have recently retained new counsel;

15
16 THEREFORE, in light of the foregoing, the Parties hereby stipulate, and respectfully request
17 the Court to order, as follows:

18 1. Defendants shall have until July 11, 2025, to file and serve their response to the Second
19 Amended Complaint;

20 2. To the extent Defendants file a motion to dismiss the Second Amended Complaint,
21 Plaintiff shall file and serve any response in opposition to Defendants’ motion to dismiss by August
22 8, 2025, and Defendants shall file and serve any reply by August 22, 2025.

23 3. Nothing in this Stipulation is intended in any way to waive or affect any rights, claims,
24 defenses, objections or arguments that any party may have with respect to any matter, other than those
25 expressly addressed and agreed to in paragraphs 1 through 2 above.
26

27 IT IS SO STIPULATED.
28

1 DATED: June 20, 2025

/s/ Yi-Chin Ho

Yi-Chin Ho (CA SBN 204834)
HUGHES HUBBARD & REED LLP
1999 Avenue of the Stars, 9th Floor
Los Angeles, CA 90071
Telephone: (213) 613-2800
Fax: (213) 613-2950
Email: yi-chin.ho@hugheshubbard.com

*Attorney for Defendants MAXEON SOLAR
TECHNOLOGIES, LTD., WILLIAM MULLIGAN, and
KAI STROHBECKE*

9 /s/James M. Wilson Jr.

James M. Wilson, Jr. (*pro hac vice*)
FARUQI & FARUQI, LLP
685 Third Avenue, 26th Floor
New York, NY 10017
Telephone: 212-983-9330
Facsimile: 212-983-9331
Email: jwilson@faruqilaw.com

Robert W. Killorin (*pro hac vice*)
FARUQI & FARUQI, LLP
3565 Piedmont Road NE
Building Four, Suite 380
Atlanta, GA 30305
Telephone: 404-847-0617
Facsimile: 404-506-9534
Email: rkillorin@faruqilaw.com

Lisa Tamiko Omoto (CA SBN 303830)
Faruqi & Faruqi, LLP
1901 Avenue of the Stars, Suite 1060
Los Angeles, CA 90067
Telephone: (424) 365-3225
Email: lomoto@faruqilaw.com

*Attorneys for Lead Plaintiff JEYAKUMAR VS MENON
and Lead Counsel for the putative class*

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(I)(3)

I, Yi-Chin Ho, attest that concurrence in the filing of this document has been obtained from the other signatories.


DATED: June 20, 2025

/s/ Yi-Chin Ho
Yi-Chin Ho

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 20, 2025



The Honorable Edward M. Chen
United States District Judge